

### REMARKS/ARGUMENTS

In view of the foregoing amendments and the following remarks, the applicants respectfully submit that the pending claims recite subject matter that is statutory under 35 U.S.C. § 101, comply with 35 U.S.C. § 112, and are not unpatentable under 35 U.S.C. § 103. Accordingly, it is believed that this application is in condition for allowance. **If, however, the Examiner believes that there are any unresolved issues, or believes that some or all of the claims are not in condition for allowance, the applicants respectfully request that the Examiner contact the undersigned to schedule a telephone Examiner Interview before any further actions on the merits.**

The applicants will now address each of the issues raised in the outstanding Office Action.

#### Rejections under 35 U.S.C. § 112

Claims 1-14, 23 and 25 stand rejected under 35 U.S.C. § 112 because the Examiner believes that the term "anchor-heavy" is not defined by the claim and that the specification does not provide a standard for ascertaining the scope of the invention. Since this term has been deleted from the claims, this ground of rejection is rendered moot. Moreover, the applicants respectfully submit that one of ordinary skill in the art would be reasonably apprised of the scope of the invention, and that the pending claims are definite under 35 U.S.C. § 112, ¶ 2. Accordingly, the applicants

respectfully request that the Examiner withdraw this ground of rejection.

Claims 4, 8 and 12 stand rejected under 35 U.S.C. § 112 because they include the terms "about three" and "about four," which the Examiner asserts are not defined by the claim and the specification do not provide a standard for ascertaining the scope of the invention. The applicants respectfully request that the Examiner reconsider and withdraw this ground of rejection in view of the following.

First, the applicants believe that the Examiner intended to reject claim 7 instead of claim 8. Claims 7 and 12 have been canceled. Claim 4, as amended, does not recite the purportedly indefinite term. Accordingly, this ground of rejection is no longer applicable and should be withdrawn.

Claims 1-26 stand rejected under 35 U.S.C. § 112, first paragraph, since the Examiner believes that the claimed invention is not supported by either a specific and substantial asserted utility or a well established utility. The applicants respectfully submit that this ground of rejection should be withdrawn for the reasons discussed below with reference to the corresponding rejection under 35 U.S.C. § 101.

#### **Rejections under 35 U.S.C. § 101**

Claims 1-26 stand rejected under 35 U.S.C. § 101 because the Examiner contends that the claimed invention is not supported by either a specific and substantial

asserted utility or a well established utility. The applicants respectfully request that the Examiner reconsider and withdraw this ground of rejection in view of the following.

The Examiner contends that a practical application or result of the invention is not clearly recited in the claims. (See Paper No. 20041222, page 3.) In particular, the Examiner contends that the claims merely manipulate abstract ideas using a mathematical operation (counting), without actually completing a claimed practical application. (See Paper No. 20041222, pages 12 and 13.)

The claims have been amended to recite a practical application of the claimed invention -- namely controlling the re-authoring of components of a document. As stated in the specification, this is useful. For example, the specification states:

Various aspects of the present invention may take place in an environment in which a device with a relatively small display is to render content, such as Web documents for example, that were designed and authored with the assumption that they would be rendered on larger display devices. Figure 1 is a high level block diagram of such an environment 100. As shown in Figure 1, a device 110 with a relatively small display screen 112 can send search queries and/or content requests as indicated by communication 140, and can receive search results and/or content reformatted for its smaller display 112 as indicated by communication 150. The device 110 may be a personal digital assistant, a portable and/or untethered information access device, a (wireless

application protocol-enabled (or "WAP-enabled")) cellular phone, a wireless telephone, etc.

A search engine 132 may be used to respond to search queries. An example of such a search engine is that provided and licensed by Google, Inc. of Mountain View, California. A content server 134 may provide content, such as Web documents for example, in response to requests. Much of such content will be authored and formatted with the assumption that it will be rendered on a normal size display screen (e.g., 15 inches to 21 inches).

A format converter 136 may be used to convert the format of the content. For example, the format converter 136 may be used to convert content authored and formatted with the assumption that it will be rendered on a normal size display screen (e.g., HTML documents), to a format better suited for rendering on a smaller size display screen (e.g., WML documents). An example of such a format converter 136 is a WAP proxy operated by Google, Inc. of Mountain View, CA. The present invention may reside within the format converter 136. Naturally, the format converter 136 may be a part of the content server 134 and/or may be a client-side utility on the device 110. Further, the various operations of the format converter 136 may be performed at various facilities (e.g., server, proxy, client device, etc.). The present invention may be used as a part of a format converter 136 as described in § 4.3.1 below. Basically, the format converter 136 may include an automated re-authoring process 137. This process 137 may include a navigation bar detection process 138 and an objectionable navigation bar

detection process 139 (which may operate on the results of the navigation bar detection process 138).

Page 10, line 4 through page 11, line 18.

Each of the independent claims, as amended, support a practical utility. Further, dependent claim 4 as amended (as well as new dependent claims 27-33) further defines a practical utility of the claimed invention. Accordingly, the applicants respectfully request that the Examiner withdraw this ground of rejection, as well as the corresponding ground of rejection under 35 U.S.C. § 112, ¶ 1.

#### **Rejections under 35 U.S.C. § 103**

Claims 1, 9, 15 and 18-26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the paper "How can I find out how many hyperlinks there are on a page?" ("the Cluey Webpage"). The applicants respectfully request that the Examiner reconsider and withdraw this ground of rejection in view of the following.

#### ***Claims 1, 9, 23 and 25***

Independent claims 1, 23 and 25 are not rendered obvious by the Cluey Webpage because the Cluey Webpage neither teaches, nor suggests, (i) analyzing anchors of a document component, (ii) analyzing non-anchor text of the component, and (iii) re-authoring the component, wherein the act of re-authoring the component is controlled using the analysis of the anchors and the non-anchor-text of the component. As the Examiner notes, the Cluey patent

discusses counting links in a document. However, merely determining a number of links in an HTML document does not teach or suggest, the features listed above.

Further, the Examiner noted that the art-based rejections could be overcome by clarifying the claims and by adding some limitation towards the practical application of the invention. (See Paper No. 20041222, page 15.) The applicants respectfully submit that independent claims 1, 23 and 25, as amended, clarify the invention and define a practical application.

Accordingly, independent claims 1, 23 and 25 are not rendered obvious by the Cluey Webpage for at least the foregoing reasons. Since claim 9 depends from claim 1, it is similarly not rendered obvious by the Cluey Webpage.

***Claims 15, 18-20, 24 and 26***

Independent claims 15, 24 and 26 are not rendered obvious by the Cluey Webpage because the Cluey Webpage neither teaches, nor suggests, (i) determining for each of a number of document components, whether or not the component is a navigation bar, and (ii) for each of the document components that is determined to be a navigation bar, determining, with the machine, whether or not the navigation bar is disqualified from being classified as an objectionable navigation bar, and re-authoring the navigation bar, wherein the re-authoring of the navigation bar is controlled using the determination of whether or not the navigation bar is disqualified from being classified as an objectionable navigation bar.

Further, the Examiner noted that the art-based rejections could be overcome by clarifying the claims and

by adding some limitation towards the practical application of the invention. (See, Paper No. 20041222, page 15.) The applicants respectfully submit that independent claims 15, 24 and 26, as amended, clarify the invention and define a practical application.

Accordingly, these claims are allowable over the Cluey Webpage. Since claims 18-20 depend, either directly or indirectly, from claim 15, these claims are similarly allowable.

#### **Claims 21 and 22**

Independent claim 21 is not rendered obvious by the Cluey Webpage because the Cluey Webpage neither teaches, nor suggests, (i) segmenting a document into components by generating a parse tree based on the document, wherein a first node corresponding to a first component is a child of a second node of a second component if the first component is included in the second component, (ii) for each of the nodes of the parse tree, determining whether or not the node corresponds to a navigation bar component, and (iii) for each of the nodes that is determined to correspond to a navigation bar, determining, with the machine, whether or not the navigation bar is disqualified from being classified as an objectionable navigation bar, and re-authoring the navigation bar, wherein the re-authoring of the navigation bar is controlled using the determination of whether or not the navigation bar is disqualified from being classified as an objectionable navigation bar.

Further, the Examiner noted that the art-based rejections could be overcome by clarifying the claims and by adding some limitation towards the practical

application of the invention. (See, Paper No. 20041222, page 15.) The applicants respectfully submit that independent claim 20, as amended, clarifies the invention and defines a practical application.

Accordingly, independent claim 20 is not rendered obvious by the Cluey Webpage for at least the foregoing reasons. Since claim 22 depends from claim 21, it is similarly patentable over the Cluey Webpage.

Claims 2-4, 6, 7, 10-12, 14, 16 and 17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Cluey Webpage in view of U.S. Patent No. 6,344,851 ("the Roberts patent"). The applicants respectfully request that the Examiner reconsider and withdraw this ground of rejection in view of the following.

Since the purported teaching of the Roberts patent fails to compensate for the deficiencies of the Cluey Webpage with respect to claims 1 and 15 above, this ground of rejection should be withdrawn for at least this reason.

Further, the cited portion of the Roberts patent concerns returning which pages of a Website or server contain a word. This has nothing whatsoever to do with the link counting discussed in the Cluey Webpage, nor does it suggest comparing a number of anchors (or even a number of links as the Examiner contends) and non-anchor words (or even a number of words as the Examiner contends) in a document component (or even in a document as the Examiner contends). Accordingly, one skilled in the art would not have been motivated to combine these references as proposed by the Examiner. Therefore, this



ground of rejection should be withdrawn for at least this additional reason.

**New claims**

New dependent claims 27-29 further define the invention over the cited art. These claims are supported, for example, by page 10, line 29 through page 11, line 5.

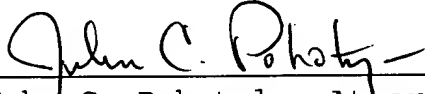
New dependent claims 30-33 further define the invention over the cited art. These claims are supported, for example, by section 4.4 of the specification, as well as Figures 6A-8C.

**Conclusion**

In view of the foregoing amendments and remarks, the applicants respectfully submit that the pending claims are in condition for allowance. Accordingly, the applicants request that the Examiner pass this application to issue.

Respectfully submitted,

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